

MEMO ENDORSED

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

Innovative Sports Management, Inc. d/b/a Integrated
Sports Media,

Plaintiff,

-against-

**PLAINTIFF'S MOTION FOR
DEFAULT JUDGMENT**

Civil Action No.
7:19-CV-00937-NSR

JUAN PABLO LA MADRID and JANET MARGOT
CAMPOS, Individually, and as officers, directors,
shareholders and/or principals of INCA GAUCHO
CORPORATION, d/b/a INCA & GAUCHO,

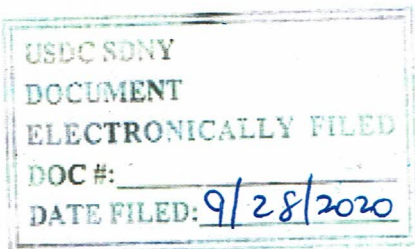
and

INCA GAUCHO CORPORATION, d/b/a INCA &
GAUCHO,

Defendants.

COMES NOW PLAINTIFF, Innovative Sports Management, Inc., and upon the affidavit of Julie Cohen Lonstein, Esq., in support of said application and the exhibits attached thereto, moves this Court for an Order granting the entry of default judgment under 47 U.S.C. § 605(a) on COUNT I and under 17 U.S.C. § 501(a) on COUNT III of the Plaintiff's Complaint against the Defendants, *jointly and severally*, as follows:

- 1) TEN THOUSAND DOLLARS (\$10,000.00) pursuant to 47 U.S.C. § 605(e)(3)(C)(i)(II) and
- 2) TEN THOUSAND DOLLARS (\$10,000.00) pursuant to 47 U.S.C. § 605(e)(3)(C)(ii), for Defendant's willful violation of 47 U.S.C. § 605(a);



- 3) FIVE THOUSAND DOLLARS (\$5,000.00) pursuant to 17 U.S.C. §504(c)(1); and
- 4) FIVE THOUSAND DOLLARS (\$5,000.00) pursuant to 17 U.S.C. §504(c)(2), for Defendant's willful violation of 17 U.S.C. §501; and
- 5) THREE THOUSAND ONE HUNDRED SEVENTY TWO DOLLARS AND SIXTY SEVEN CENTS (\$3,172.67) pursuant to 47 U.S.C. §605(e)(3)(B)(iii) and pursuant to 17 U.S.C. §505, in the discretion of the Court, for total costs and attorney's fees.

Dated: December 18, 2019
Ellenville, New York

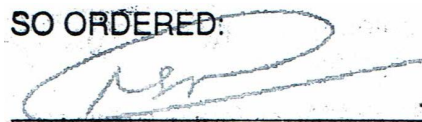
Innovative Sports Management, Inc. d/b/a Integrated Sports Media

By: /s/Julie Cohen Lonstein
JULIE COHEN LONSTEIN, ESQ. (JL8521)
Attorney for Plaintiff
LONSTEIN LAW OFFICE, P.C.
190 South Main Street: P.O. Box 351
Ellenville, NY 12428
Tel: (845) 647-8500
Fax: (845) 647-6277
Email: Legal@signallaw.com
Our File No. ISM18-01NY-07

Plaintiff's Motion for Default is denied without prejudice for failure to follow my Individual Practices. (See Attachment A.) A party seeking a default judgment shall do so by way of Order to Show Cause (which shall be filed according to ECF Rules. Clerk of the Court requested to terminate the motion (doc. 27).

Dated: Sept. 28, 2020

SO ORDERED:



HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE